

BARRY, MCTIERNAN & MOORE, L.L.C.

COUNSELORS AT LAW

2 RECTOR STREET

NEW YORK, NEW YORK 10006

WESTCHESTER OFFICE
55 CHURCH STREET
WHITE PLAINS, NY 10601
TEL: (914) 946-1030
FAX: (914) 946-3814

TEL: (212) 313-3600
FAX: (212) 608-8901
FAX: (212) 608-8902 (TOXIC TORT)

CONNECTICUT OFFICE
27 LONG MEADOW ROAD
TRUMBULL, CT 06611
TEL: (203) 261-8060
FAX: (203) 268-0384

July 6, 2012

Honorable Alvin K. Hellerstein
United States District Court
500 Pearl Street
New York, NY 10007

Re: World Trade Center Lower Manhattan Disaster Site Litigation
Index No.: 21 MC 102 (AKH)

Dear Hon. Hellerstein:

We represent defendant Sakele Brothers, L.L.C. in the above referenced matter. I write to respectfully request that the deposition for Mr. Steve Sakele take place on August 13, 2012. Due to the number of depositions scheduled in July and because of our client's availability, we are not able to produce our witness until August 13th. Plaintiff's counsel has agreed to this request.

The Court's time and consideration are appreciated.

Very truly yours,

BARRY, MCTIERNAN & MOORE

By: Suzanne M. Halbardier
Suzanne M. Halbardier

x:\cases\SB10000\CT070612

cc: ALL COUNSEL VIA ECF